

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES
PRIORITY MAIL CONTRACT 41 (MC2012-39)
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2012-47

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR TEMPORARY RELIEF**
(August 9, 2017)

The United States Postal Service hereby moves for temporary relief to allow the existing contract in this docket to remain in effect until its successor contract, Priority Mail Contract 340, takes effect. Priority Mail Contract 340 is being filed with the Commission today in Docket Nos. MC2017-169 and CP2017-262. By the terms of the contract filed in this docket, the current rates will expire on August 20, 2017.

The Postal Service and the customer have been working cooperatively on a successor contract over the past several months, but because of extenuating circumstances, the agreement was not finalized in time for the Postal Service to complete its own internal reviews and file it with the Commission more than 15 days prior to the August 20 expiration date of the existing contract. In particular, the successor contract (Priority Mail Contract 340) was delayed because of the need for additional legal review by the customer regarding the marketplace requirements language in the Appendix to the contract. That language was not present in the customer's original contract with the Postal Service, and thus required further review by the customer prior to signature. Additionally, once the successor contract was signed by the Postal Service, the Postal Service's internal financial review process took longer

than expected. If not for these unexpected delays, the parties would have been able to file the successor contract more than 15 days before the August 20 expiration of the existing contract.

The Postal Service recognizes that the Commission will not be able to complete its review of the successor contract prior to August 20. By the terms of the contract, Priority Mail Contract 340 shall become effective two business days after the Commission issues all necessary regulatory approval. Therefore, the Postal Service respectfully requests that the Commission grant a brief extension to allow the existing contract to remain in effect until such time as the Commission has completed its review and the successor contract has taken effect. Thus, the proposed extension would only last for a finite and relatively short period of time.

In conclusion, for the reasons discussed above, and in consideration of the customers' business continuity, the Postal Service hereby moves for temporary relief to allow the existing contract to remain on the competitive products list until the successor contract, which was filed with the Commission today, takes effect.

Respectfully submitted,

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